

## McMillan, Acquanette (Netta)

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**From:** John Fauvre  
**Sent:** Monday, July 14, 2025 9:22 AM  
**To:** PublicComment-AutoResponse  
**Cc:** James Macpherson  
**Subject:** City council meeting tonight: Cal Fire zones

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Dear Councilpersons:

The Cal Fire Hazard Zones adoption is back on the agenda, but it seems to me that several questions have not been addressed.

First, the accuracy of the very high hazard zones on the east bank of the Arroyo Seco is challenged by the First Street fire risk maps assessing the risk lower. First Street's methodology considers more than Cal Fire's, and includes simulated wildfire scenarios, while Cal Fire just considers the landscape and no mitigating conditions. Pasadena Water and Power also assesses the area as not high risk, while Cal Fire calls it very high hazard. First Street is relied upon by realtors for house sales and is a nationally recognized private expert.

Second, adoption of the Cal Fire Hazard Map does lead to new building codes and landscaping requirements that go into effect not immediately but in the near future. These are of uncertain merit, as the fire risk is almost entirely from high-wind wildfires, and these are uncontrollable as a practical matter. Cal Fire's "house hardening" requirements have no reliable factual basis as it is nearly impossible to tell why some houses survived a wildfire and some did not. And "zone 0" scraping of landscaping within 5 feet of any structure is no more likely to be effective than fire-resistant plants. And inspection of back yards and attics (to confirm new wire mesh barrier standards) will be intrusive and expensive.

Another question is how to justify the imposition of expense requirements on residents in these circumstances. Estimates of costs depend on particular circumstances, like the need for a new roof, but one can estimate landscaping costs in the thousands of dollars and mesh installation costs in the same range. At, say, \$7,000 per house for 4600 residents, this unfunded state mandate is not insignificant and seems unduly burdensome in these circumstances.

While the Council is required by state law to adopt the Cal Fire program, it retains control over enforcement. Thus it may be prudent to adopt the Cal Fire Hazard Map but to consider further appropriate procedures and budgeting for enforcement and support for affected residents in further proceedings.

Respectfully submitted,

John Fauvre

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